

Our Ref: 3350-03
File No: 1158.41555X00
Client Ref: RPP-3



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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of
GARRISON, et al.

:
: Group Art Unit: 2165

Serial No: 08/994,363

:
: Examiner: S. Rimell

Filed: December 19, 1997

For: ELECTRONIC BILL PAYMENT USING ACCOUNT RANGING TO DETERMINE
THE APPROPRIATE ONE OF MULTIPLE PAYMENT REMITTANCE CENTERS
OF A SINGLE PAYEE

TRANSMITTAL

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

June 6, 2005

Sir:

Transmitted herewith is a Reply Brief in the above-identified application.

[] No additional fee is required.

[X] Also attached: Amendment Under 37 CFR §1.116; Request for Oral Hearing;
Credit Card Payment Form

The fee (if applicable) has been calculated as shown below:

	NO. OF CLAIMS	HIGHEST PREVIOUSLY PAID FOR	EXTRA CLAIMS	RATE	FEE
Total Claims	20	20	0	x \$50 =	\$0
Independent Claims	4	4	0	x \$200 =	\$0
Request for Oral Hearing Fee					\$1,000.00
TOTAL FEE DUE					\$1,000.00

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- [X] A Credit Card Payment form in the amount of \$1,000.00 is attached
- [X] Commissioner is hereby authorized to charge any additional fees associated with this communication or credit any overpayment, to Deposit Account No. 01-2135, including any filing fees under 37 CFR 1.16 for presentation of extra claims and any patent application processing fees under 37 CFR 1.17.

Respectfully Submitted,

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Enclosures

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THE APPROPRIATE ONE OF MULTIPLE PAYMENT REMITTANCE CENTERS
OF A SINGLE PAYEE

REPLY BRIEF

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

June 6, 2005

Sir:

This Reply Brief is submitted further to the Supplemental Appeal Brief filed July 14, 2004, and in response to the Examiner's Answer issued on April 4, 2005. An After Final Amendment under 37 CFR 1.116 is submitted concurrently herewith. In anticipation of entry of the After Final Amendment and to assist the Board in its review of the issues on appeal, a clean copy of the claims, as amended, is presented in a "Substitute Appendix of Claims Under Appeal" attached hereto.

GROUND FOR REJECTION

Under Rule 41.39, new grounds for rejection must be designated as such.

On page 3 of the Examiner's Answer, it is stated that "The following ground(s) of rejection are applicable to the appealed claims". There is no designation of "new grounds for rejection" in the presentation of the claim rejections under 35USC §102(e) and §103(a) presented on pages 3-6 of the Examiner's Answer. Likewise, in the "Response to Argument" presented on pages 6-10 of the Examiner's Answer, there is no designation of new grounds for rejection.

It is therefore understood that no new grounds for rejection are presented in the Examiner's Answer, for consideration in this Appeal. Accordingly, the anticipation and obviousness rejections are traversed on the grounds previously presented in the Supplemental Appeal Brief, together with those set forth below.

THE EXAMINER'S RESPONSE TO ARGUMENT

In view of the above, this Reply Brief is directed to the Examiner's Response to Argument set forth on pages 6-10 of the Examiner's Answer in rebuttal of the arguments presented in the Appeal Brief.

As amended in the After Final Amendment filed concurrently herewith, claims 1-20 are pending in this application, of which claims 1, 6, 11 and 16 remain independent. Claims 4 and 9 are objected to, but have been deemed allowable if rewritten in independent form. Accordingly, the final rejection of each of claims 1-3, 5-8, and 10-20 is subject to appeal.

Claims 1-3, 5-8, 10-13, 15-18 and 20 stand rejected as anticipated under 35 USC §102(e) by Kolling, et al. (U.S. Patent No. 5,920,847), and claims 14 and 19 stand rejected as obvious under 35 USC §103(a) over Kolling, et al.

For purposes of this appeal, the patentability of each of independent claims 1, 6, 11 and 16 (as amended in the After Final Amendment) is separately argued. Accordingly, claims 2-3 and 5 stand and fall with claim 1, claims 7-8 and 10 stand and fall with claim 6, claims 12-15 stand and fall with claim 11, and claims 17-20 stand and fall with claim 16.

PRIMA FACIE SUPPORT HAS NOT BEEN ESTABLISHED FOR THE REJECTION

Claims 1-3 and 5

As amended in the After Final Amendment filed concurrently with this Reply Brief, **claim 1** requires:

receiving a payor request to make a payment to a payee having a plurality of payment remittance centers;

processing the request to identify a payor account number with the payee;

processing the account number to select a single remittance center of the plurality of remittance centers;

directing remittance advice for the payment to the payee at the single remittance center; and

directing the payment to other than the single remittance center [note: this

limitation was previously (prior to the After Final Amendment filed concurrently herewith) recited in claim 21, and was accordingly argued in the Supplemental Appeal Brief and the Examiner's Answer with reference to claim 21].

Thus, claim 1 requires, *inter alia*, (i) that a payee (such as a merchant or other biller) have a plurality of payment remittance centers, (ii) that the payor have a payor account number with the payee which can be (a) identified by processing the payor's request to make a payment and (b) processed to select one of the multiple payment remittance centers and (iii) that remittance advice for the payment to the payee be directed to the selected payment remittance center of the payee, while the payment itself is directed to other than the selected payment remittance center.

Turning to the Examiner's Response to Arguments and more particularly to the paragraph bridging pages 7 and 8 of the Examiner's Answer, which is directed to the traversal arguments presented in the Supplemental Appeal Brief with respect to claims 1 and 21 (noting that claim 1 now incorporates the limitations previously recited in claim 21, which is now cancelled).

1.) a payor account number with the payee which can be identified by processing the payor's request to make a payment and processed to select one of the multiple payment remittance centers

As argued in the Supplemental Appeal Brief (see, for example, pages 9-12), while Kolling discloses that the payor has a payor account number with the payee ["the

consumer's account with the biller is referred to herein as the C-B ("customer-biller") account number, thereby distinguishing that account from other accounts", see column 3, lines 56-62], Kolling processes a different number which is described as the BRN (i.e. biller reference number), not the C-B account number, to identify the BID (bank ID) for the applicable biller's bank B (rather than a different biller's bank) to which the consumer's bank (e.g. bank C) directs the payment (\$ in Figure 4) and payment information (message 124 in Figure 4) See column 16, lines 7-60, and column 17, lines 15-30).

Thus, according to Kolling, the consumer's (payor's) bank C processes a BRN of the biller to identify a BID which is used to select the biller's (payee's) bank B from a group of banks consisting of the biller's (payee's) bank B and the banks of other billers (other payees). The payment and payment information are directed from the consumer's (payor's) bank C to the selected biller bank, i.e. biller's (payee's) bank B.

In responding to these arguments in the Examiner's Answer (see page 7, second paragraph), it is asserted that "The term "payor account number" does not require a unique identification of one specific party, a unique association to the payor, be exclusive to the payor or different from all other account numbers...In the broadest reasonable sense, the "payor account number" is some number associated between the payor and payee. This is directly supported by appellant's specification, where the term "payor account number with the payee" (page 7, line 3) is the only elaboration of this term that is ever provided. The claim itself does not define the term". Based on this position, the Examiner continues to argue that Kolling's BRN (biller reference number)

corresponds to the required “payor account number with the payee”.

However, the Examiner’s position ignores an express limitation of claim 1. In particular, claim 1 does not simply require any “payor account number”, but instead requires a “payor account number with a payee” (emphasis added).

The term “payor account number with a payee” is a term that is well understood in the art to represent a number representing a unique association between a payor (e.g. the customer) and a payee (e.g. a merchant), which is necessarily exclusive to the payor and different from all account numbers with other payors.

Furthermore, the present specification itself provides clear guidance as to the meaning of “payor account number with the payee”. Although the Examiner points to page 7, line 3, of the present specification as “the only elaboration of this term [“payor account number with the payee”] that is ever provided [in the present specification]”, it is respectfully submitted that this is not the case. Rather, on page 2, lines 15-20, of the present specification it is made abundantly clear that the “payor account number with the payee” is an account number that the merchant (i.e. the payee) can use to associate a payment with the consumer (i.e. the payor). Kolling’s BRN is, as the Examiner appears to acknowledge, incapable of being used by the merchant (i.e. the payee) to associate a payment with the consumer (i.e. the payor).

Accordingly, the Examiner’s position is inconsistent with the meaning of “payor account number with the payee” as defined in the application itself.

As reported by the AIPLA, Solicitor John Whealan, in presenting oral arguments on behalf of the U.S. Government in *Phillips v. AWH Corp.* Fed. Cir., no. 03-1269 (argued on February 8, 2005), recently highlighted the U.S. Government's position that in properly construing claim language the starting point is the specification and the correct test is "the ordinary meaning of the term to a person of skill in the art at the time the invention was made in the context of the words of the patent", noting that this point is made by the concurring opinion in *Super Guide Corp. v. Direct TV Enterprises*, 358 F. 3d 870, 69 USPQ 2d 1865 (Fed. Cir. 2004).

Accordingly, the Examiner's position also appears to be inconsistent with that of the U.S. Government, as reflected in the arguments recently presented by the Solicitor before the Court of Appeals for the Federal Circuit.

Further still, while the Examiner argues that the Kolling's biller reference number (BRN) corresponds to the required "payor account number with the payee", Kolling in fact teaches that the payor has a payor account number with the payee, characterized as the "C-B (consumer-biller) account number", which the merchant (i.e. the payee) can use to associate a payment with the consumer (i.e. the payor). As noted above, Kolling specifically discloses that "the consumer's account with the biller is referred to herein as the C-B ("customer-biller") account number, thereby distinguishing that account from other accounts", see column 3, lines 56-62 (emphasis added). Hence, according to Kollings own disclosure, it is the "C-B account number" (not the BRN) that clearly corresponds to the "payor account number with the payee" recited in the present claims.

Thus, the Examiner's asserted position is also inconsistent with the teachings of the Examiner's own applied prior art.

2.) that a payee (such as a merchant or other biller) have a plurality of payment remittance centers

As argued in the Supplemental Appeal Brief (see, for example, page 12), while the Examiner asserts that in Kolling the consumer's (payor's) bank C (16) and biller (payee's) bank B (18) correspond to the requirement of claim 1 that the payee (e.g. the merchant or other biller) have a plurality of payment remittance centers, as disclosed by Kolling discloses that the consumer's (payor's) bank C only has an association with the consumer (payor). Indeed that Examiner has failed to identify any disclosure within Kolling which teaches or otherwise suggest an association of consumer's (payor's) bank C with the biller (payee). Thus, it is entirely unclear how the consumer's bank C could possibly correspond to a second biller (payee) remittance center of Kolling's biller (payee). (See, for example, Figure 4 and column 14, lines 22-47)

In responding to these arguments in the Examiner's Answer (see top of page 8), it is asserted that "Kolling et al. discloses (in FIG. 4) a payor (Consumer C), remittance centers (Bank C and Bank B) and an account number BRN that will uniquely identify bank B as the bank for the payee (biller)."

However, the Examiner's position ignores an express limitation of claim 1. In particular, claim 1 does not simply require any "remittance centers". Rather, what is

explicitly required is that the payee (biller) have a plurality of "payment remittance centers" (emphasis added).

The Examiner's contention that Kolling's consumer's bank Bank C and biller's Bank B correspond to the required plurality of payment remittance centers of the payee (e.g. biller) has been and continues to be baldly asserted, without the Examiner identifying any objective supported within the applied Kolling reference. As understood, consumer's Bank C is disclosed by Kolling to only have a relationship with the consumer, and lacks any disclosure that consumer's Bank C should or for that matter could serve as another payment remittance center to which payment could be made, let alone another payment remittance center of biller B (like biller Bank B) to which a payment to biller B could be made.

Hence, the Examiner's assertion is not, and cannot be, understood, and is entirely unsupported by the objective evidence of record.

3.) that remittance advice for the payment to the payee be directed to the selected payment remittance center of the payee, while the payment itself is directed to other than the selected payment remittance center

In the Supplemental Appeal Brief (see top of page 14, with reference to claim 21), it is argued that in accordance with Kolling's teachings, message 124 (which the Examiner points to as corresponding to the claimed remittance advice for the payment) and the \$ payment to biller B are directed from the consumer's (payor's) bank C to the biller's

(payee's) bank B. This is, for example, shown in Kolling's Figure 4 and described with reference thereto.

In responding to these arguments in the Examiner's Answer (see top of page 8, with reference to claim 21), it is asserted that "FIG. 4 of Kolling et al. clearly discloses other remittance centers besides the biller's bank B, including the settlement bank (128) and the distinct the payment network (102). These features are clearly taught in FIG. 4 of Kolling et al."

As noted above, what the recited limitations require is that that the payment remittance advice (for the payment to the payee) be directed to the selected payee payment remittance center and that the payment itself be directed to other than the selected payee payment remittance center. Thus, the relevance of the Examiner's assertion is not, and cannot be, understood.

Furthermore, it is respectfully submitted that Kolling explicitly teaches that the payment (the \$ in Figure 4) and payment remittance advice (message 124 in Figure 4) are directed to the same center (i.e. to biller's Bank B) and there is nothing identified by the Examiner within the teaching of Kolling to suggest that the payment remittance advice (for the payment to the payee) be directed to a payee payment remittance center (e.g. a SEARS' payment remittance center) and that the payment itself be directed to other than the payee payment remittance center (e.g. to SEARS' bank). Thus, there is no teaching, suggestion or inference in the prior art as a whole, which could possibly lead to the presently claimed invention.

Hence, here again, the Examiner's assertion is not, and cannot be, understood, and is entirely unsupported by the objective evidence of record.

Claims 6-8 and 10

As amended in the After Final Amendment filed concurrently with this Reply Brief, **claim 6** requires a remittance payment system having:

a communicative interface configured to receive a payor request to make payment to a payee having a plurality of payment remittance centers; and

a processor configured to process the payor request to identify a payor account number with a payee and the account number to select a single payment remittance center of the plurality of payment remittance centers, and to generate a signal directing remittance advice for the payment to the payee at the single payment remittance center;

wherein the processor is further configured to direct the payment to other than the single remittance center. [note: this limitation was previously (prior to the After Final Amendment filed concurrently herewith) recited in claim 22, and was accordingly argued in the Supplemental Appeal Brief and the Examiner's Answer with reference to claim 22].

Thus, claim 6 requires, *inter alia*, (i) that a payee (such as a merchant or other biller) have a plurality of payment remittance centers, (ii) that the payor have a payor account number with the payee which a processor can (a) identify by processing the payor's request to make a payment and (b) process to select one of the multiple

payment remittance centers and (iii) that the processor generate a signal to direct remittance advice for the payment to the payee to the selected payment remittance center of the payee, while directing the payment itself to other than the selected payment remittance center.

Turning to the Examiner's Response to Arguments and more particularly to the first full paragraph on page 8 of the Examiner's Answer, which is directed to the traversal arguments presented in the Supplemental Appeal Brief with respect to claims 6 and 22 (noting that claim 6 now incorporates the limitations previously recited in claim 22, which is now cancelled).

The Examiner's Answer presents arguments, in rebuttal of the traversal arguments presented in the Supplemental Appeal Brief with respect to claims 6 and 22, which are substantively identical to those presented in rebuttal of the traversal arguments in the Supplemental Appeal Brief relating to claims 1 and 21. Accordingly, it is respectfully submitted that for reasons similar to those detailed above, no prima facie basis has been established for the rejection of claims 6-8 and 10.

However, it should be understood that the scope of claim 6 differs from claim 1 in that, for example, claim 6 also requires a processor capable of processing the payor request to identify a payor account number with a payee and the account number to select a single payment remittance center of the plurality of payment remittance centers, generating a signal directing remittance advice for the payment to the payee at the single payment remittance center, and directing the payment to other than the single

remittance center.

Thus, claim 6 further requires that a processor (or a group of processors representing a particular entity, such as a payment service provider) be capable of processing the payor request to identify the account number and the identified account number to select a single one of the payee's payment remittance centers, of generating a signal directing remittance advice for the payment to the payee at the single payment remittance center, and of directing the payment to other than the single remittance center.

It is unclear whether or not this aspect of claim 6 has been considered in the rejection of claim 6 and its dependencies.

Claims 11-15

As amended in the After Final Amendment filed concurrently with this Reply Brief, **claim 11** requires a stored computer program capable of causing a computer to:

receive a payor request to make payment to a payee having a plurality of payment remittance centers;

process the payor request to identify a payor account number with the payee and the account number to select a single payment remittance center of the plurality of payment remittance centers;

generate a signal to direct payment remittance advice for the payment to the payee at the single payment remittance center; and

generate a signal to direct the payment to other than the single remittance center. [note: this limitation was previously (prior to the After Final Amendment filed concurrently herewith) recited in claim 23, and was accordingly argued in the Supplemental Appeal Brief and the Examiner's Answer with reference to claim 23].

Thus, claim 11 requires, *inter alia*, (i) that a payee (such as a merchant or other biller) have a plurality of payment remittance centers, (ii) that the payor have a payor account number with the payee which a computer (executing the programming) can (a) identify by processing the payor's request to make a payment and (b) process to select one of the multiple payment remittance centers and (iii) that the computer (executing the programming) generate a signal to direct remittance advice for the payment to the payee to the selected payment remittance center of the payee, and a signal to direct the payment itself to other than the selected payment remittance center.

Turning to the Examiner's Response to Arguments and more particularly to the paragraph bridging pages 8 and 9 of the Examiner's Answer, which is directed to the traversal arguments presented in the Supplemental Appeal Brief with respect to claims 11 and 23 (noting that claim 11 now incorporates the limitations previously recited in claim 23, which is now cancelled).

The Examiner's Answer presents arguments, in rebuttal of the traversal arguments presented in the Supplemental Appeal Brief with respect to claims 11 and 23, which are substantively identical to those presented in rebuttal of the traversal arguments in the Supplemental Appeal Brief relating to claims 1 and 21. Accordingly, it

is respectfully submitted that for reasons similar to those detailed above, no prima facie basis has been established for the rejection of claims 11-15.

However, it should be understood that the scope of claim 11 differs from claim 1 in that, for example, claim 6 also requires a programming executable by a computer to process the payor request to identify a payor account number with a payee and the account number to select a single payment remittance center of the plurality of payment remittance centers, to generate a signal directing remittance advice for the payment to the payee at the single payment remittance center, and to generate a signal directing the payment to other than the single remittance center.

Thus, claim 11 further requires that programming executable by a computer (or a group of computers representing a particular entity, such as a payment service provider) be capable of causing the computer(s) to process the payor request to identify the account number and the identified account number to select a single one of the payee's payment remittance centers, to generate a signal directing remittance advice for the payment to the payee at the single payment remittance center, and to generate a signal directing the payment to other than the single remittance center.

It is unclear whether or not this aspect of claim 11 has been considered in the rejection of claim 11 and its dependencies.

Claims 16-20

As amended in the After Final Amendment filed concurrently with this Reply Brief, **claim 16** requires a system having, *inter alia*:

a first network station, representing a payor for generating payor payment information, including a name of a payee, address data for the payee, and a payor account number with the payee, and communicating the payment information to the network; and

a second network station, representing a payment service provider for receiving the payment information, processing the account number to identify a single remittance center of plural remittance centers of the payee, and directing payment remittance advice associated with a payment to the payee at the single remittance center;

wherein the second network station is further configured to direct the payment to other than the single remittance center [note: this limitation was previously (prior to the After Final Amendment filed concurrently herewith) recited in claim 24, and was accordingly argued in the Supplemental Appeal Brief and the Examiner's Answer with reference to claim 24].

Thus, claim 24 requires, *inter alia*, (i) that a payee (such as a merchant or other biller) have plural remittance centers, (ii) that the payor have a payor account number with the payee which a second network station representing a payment service provider can process to select one of the multiple remittance centers and (iii) that the second network station direct remittance advice for the payment to the payee to the selected

payment remittance center of the payee, and direct the payment itself to other than the selected payment remittance center.

Turning to the Examiner's Response to Arguments and more particularly to the first full paragraph on page 9 of the Examiner's Answer, which is directed to the traversal arguments presented in the Supplemental Appeal Brief with respect to claims 16 and 24 (noting that claim 16 now incorporates the limitations previously recited in claim 24, which is now cancelled).

The Examiner's Answer presents arguments, in rebuttal of the traversal arguments presented in the Supplemental Appeal Brief with respect to claims 16 and 24, which are substantively identical to those presented in rebuttal of the traversal arguments in the Supplemental Appeal Brief relating to claims 1 and 21. Accordingly, it is respectfully submitted that for reasons similar to those detailed above, no prima facie basis has been established for the rejection of claims 16-20.

However, it should be understood that the scope of claim 16 differs from claim 1 in that, for example, claim 6 also requires a network station representing a payment service provider capable of processing a received payor account number with the payee to identify a single remittance center of the plural remittance centers of the payee, directing remittance advice for the payment to the payee at the single remittance center, and directing the payment to other than the single remittance center.

Thus, claim 16 further requires that a network station representing a payment service provider be capable of processing the received account number identify a single

one of the payee's remittance centers, directing remittance advice for the payment to the payee at the single remittance center, and directing the payment to other than the single remittance center.

It is unclear whether or not this aspect of claim 16 has been considered in the rejection of claim 16 and its dependencies.

KOLLING DOES NOT TEACH THE CLAIMED INVENTION

Claims 1-3, and 5

It is respectfully submitted that, in view of the above, Kolling lacks any teaching, or for that matter suggestion, of at least the following features and limitations of **claim 1**:

receiving a payor request to make a payment to a payee having a plurality of payment remittance centers;

processing a payor account number with a payee to select a single remittance center of the plurality of remittance centers;

directing remittance advice for the payment to the payee at the single remittance center; and

directing the payment to other than the single remittance center.

Claims 6-8 and 10

It is respectfully submitted that, in view of the above, Kolling lacks any teaching, or for that matter suggestion, of at least the following features and limitations of **claim 6**:

a communicative interface configured to receive a payor request to make payment to a payee having a plurality of payment remittance centers; and

a processor configured to process a payee and a payor account number with a payee to select a single payment remittance center of the plurality of payment remittance centers, and to generate a signal directing remittance advice for the payment to the payee at the single payment remittance center, and to direct the payment to other than the single remittance center.

Claims 11-13 and 15

It is respectfully submitted that, in view of the above, Kolling lacks any teaching, or for that matter suggestion, of at least the following features and limitations of **claim**

11:

a stored computer program capable of causing a computer to:

receive a payor request to make payment to a payee having a plurality of payment remittance centers;

process a payor account number with the payee to select a single payment remittance center of the plurality of payment remittance centers;

generate a signal to direct payment remittance advice for the payment to the payee at the single payment remittance center; and

generate a signal to direct the payment to other than the single remittance center.

Claims-16-18 AND 20

It is respectfully submitted that, in view of the above, Kolling lacks any teaching, or for that matter suggestion, of at least the following features and limitations of **claim 16**:

a first network station, representing a payor for generating payor payment information, including a name of a payee and address data for the payee, and communicating the payment information to the network; and

a second network station, representing a payment service provider for receiving the payment information, processing a payor account number with the payee in the received payment information to identify a single remittance center of plural remittance centers of the payee, directing payment remittance advice associated with a payment to the payee at the single remittance center, and directing the payment to other than the single remittance center.

KOLLING DOES NOT SUGGEST THE CLAIMED INVENTION

Claims 14 and 19

It is further respectfully submitted that, in view of the above, Kolling also lacks any suggestion, of at least the above identified features and limitations of **claim 14** parent claim 11 and **claim 19** parent claim 16.

CONCLUSION

It is respectfully submitted that the claims have been finally rejected without proper consideration of all the objective evidence bearing on the issues of anticipation and obviousness. Thus, on this basis alone, the Examiner has failed to prima facie establish that one having ordinary skill in the art would have found the claimed invention, as a whole, anticipated or obvious.

Additionally, the objective evidence of record in this case can only lead to the conclusion that the prior art does not anticipate or make obvious the claimed invention. Indeed, the Examiner has not even established that each explicitly claimed element is found somewhere in the applied prior art, let alone that the invention as a whole is anticipated or obvious.

The record evidences that the Examiner has, at best, opted to rely on simplicity and improper hindsight rather than the proper criteria for resolving anticipation and obviousness, since there is no objective basis that could reasonably be viewed to support the conclusions asserted in the final Official Action or the Examiner's Answer. Furthermore, the deficiencies in the applied art cannot be remedied by the asserted general conclusions.

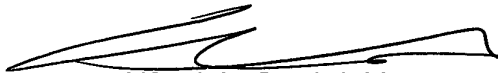
In summary, it is respectfully submitted that the applied art does not teach or suggest the invention as recited in each of the independent claims, and the Examiner has failed provided reasonable evidence to support a contrary conclusion. Furthermore, the art does not provide any teaching, or suggestion within its teachings, which would lead to the

features or advantages of the instant invention, and the claims patentably define over the art. The rejections therefore can only be based on an improper hindsight reconstruction or pure speculation. Thus, the rejection of the pending claims is in error, and reversal is clearly in order and is courteously solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 01-2135 and please credit any excess fees to such deposit account.

Respectfully Submitted,

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SUBSTITUTE APPENDIX OF CLAIMS UNDER APPEAL

1. A computer implemented remittance payment process, comprising:

receiving a payor request to make a payment to a payee having a plurality of payment remittance centers;

processing the request to identify a payor account number with the payee;

processing the account number to select a single remittance center of the plurality of remittance centers;

directing remittance advice for the payment to the payee at the single remittance center; and

directing the payment to other than the single remittance center.

2. The computer implemented remittance payment process of claim 1, wherein the account number is processed to identify information included in the account number which corresponds to the single remittance center.

3. The computer implemented remittance payment process of claim 2, wherein the identified information included in the account number has one or more alphanumeric characters.

5. The computer implemented remittance payment process of claim 1, further comprising:

storing alteration rules for each payee indicating a format in which that payee is to receive an account number; and

transforming the account number into an altered account number according to the alteration rules.

6. A remittance payment system, comprising:

a communicative interface configured to receive a payor request to make payment to a payee having a plurality of payment remittance centers; and

a processor configured to process the payor request to identify a payor account number with a payee and the account number to select a single payment remittance center of the plurality of payment remittance centers, and to generate a signal directing remittance advice for the payment to the payee at the single payment remittance center;

wherein the processor is further configured to direct the payment to other than the single remittance center.

7. The remittance apparatus of claim 6, wherein the processor is further configured to process the account number to identify information included in the account number and to select the single payment remittance center based upon the identified information.

8. The computer implemented remittance payment process of claim 7, wherein the

identified information included in the account number has one or more alphanumeric characters.

10. The remittance apparatus of claim 6, further comprising:

a verification unit to verify that the account number conforms to validation rules indicating expected values for fields of the account number; and

a modification unit to alter the account number according to alteration rules expressing processing requirements of the payee to create an altered account number.

11. An article of manufacture for processing payment information, comprising:

computer readable storage medium; and

a computer program stored on the storage medium;

wherein said stored computer program is configured to be readable from said computer readable storage medium by a computer and thereby cause the computer to:

receive a payor request to make payment to a payee having a plurality of payment remittance centers;

process the payor request to identify a payor account number with the payee and the account number to select a single payment remittance center of the plurality of payment remittance centers;

generate a signal to direct payment remittance advice for the payment to the payee at the single payment remittance center; and

generate a signal to direct the payment to other than the single remittance center.

12. The article of manufacture of claim 11, wherein the computer program is further configured to cause the computer to process the account number to identify information included in the account number and to select the single remittance center based upon the identified information.

13. The article of manufacture of claim 12, wherein the identified information included in the account number has one or more alphanumeric characters.

14. The article of manufacture of claim 11, wherein the computer program is further configured to cause the computer to:

process the payor request to identify payee payment information;

process the payment information to produce an eleven digit zip code for the payee; and

access payee records corresponding to the eleven digit zip code.

15. The article of manufacture of claim 11, wherein the computer programming is further configured to cause the computer to:

transform the account number into an altered account number according to

alteration rules for the payee indicating a format in which the payee expects to receive the account number.

16. A system for processing payment information, comprising:

a communications network;

a first network station, representing a payor for generating payor payment information, including a name of a payee, address data for the payee, and a payor account number with the payee, and communicating the payment information to the network; and

a second network station, representing a payment service provider for receiving the payment information, processing the account number to identify a single remittance center of plural remittance centers of the payee, and directing payment remittance advice associated with a payment to the payee at the single remittance center;

wherein the second network station is further configured to direct the payment to other than the single remittance center.

17. The system for processing payment information of claim 16, wherein a characteristic identifying the single remittance center is included in the account number.

18. The system for processing payment information of claim 17, wherein the characteristic is one or more alphanumeric characters.

19. The system of claim 16, wherein:

the second network station further processes the payment information to produce an eleven digit zip code for the payee, and accesses payee records corresponding to the eleven digit zip code.

20. The system of claim 16, wherein:

the second network station includes a database storing alteration rules for the payee indicating a format in which that payee is to receive an account number, and transforms the received account number into an altered account number according to the alteration rules.